

EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA) FORM

Name of Function under consideration:	Merlin capital receipts proposal (to enable 25-35 affordable homes for rent to be provided per year)
Is this Function 'Major', 'Minor yet likely to have a major impact' or 'Neither'	Neither
Date(s) of completing the EqIAA:	December 2015
Person(s) completing the EqIAA:	Strategic Housing Enabling Manager

SECTION 1 – INTRODUCTORY INFORMATION

<p>1. What is the main purpose of the Function?</p> <p>To create a capital receipts income stream for Merlin to use to provide affordable homes for rent in South Gloucestershire (up to 35 per year). The demand for social housing in the district far exceeds the supply of properties available.</p>
<p>2. List the main activities of the Function:</p> <p>To deliver new affordable homes for rent for people in housing need (100% Council nominations on first letting and 75% thereafter).</p>
<p>3. Who are the main beneficiaries of the Function?</p> <p>Residents of South Gloucestershire in housing need, i.e. households accepted by the Council under its homelessness duty and households accepted on the South Gloucestershire Housing Register.</p>
<p>4. How is the overall success of the Function measured?</p> <p>Good quality affordable homes for rent delivered by Merlin in which Council nominees are housed.</p>
<p>5. What equality monitoring systems are in place to carry out regular checks on the effects of the Function on equality groups?</p> <p>Equalities information is gathered from all applicants to HomeChoice and reports on those bidding on properties and successful applicants are reviewed as part of the ongoing HomeChoice equalities analysis. Merlin carries out equalities monitoring of its customers.</p>
<p>6. What are your equality related performance indicators/measure of success for this Function?</p> <p>There are no specific equality-related PIs for this function, however measures of success are: parity of satisfaction amongst customer groups; parity of access to opportunities across customer groups.</p>

SECTION 2 – INITIAL ASSESSMENT OF IMPACT

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)	
Women/Girls	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<p>The South Gloucestershire Housing Strategy 2013-18 vision is that everyone should be able to live in a good quality home that meets their needs and that they can afford. New affordable homes for rent delivered under this initiative will contribute towards meeting this objective.</p> <p>The proposal includes a specific commitment from Merlin to provide up to £200,000 per year for aids and adaptations to Merlin stock for cases of up to £4,000. This will enable these adaptations to be provided more quickly than would otherwise be possible.</p> <p>It is anticipated that the above will result in a positive impact for all.</p>	
Men/Boys	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Lesbians, gay men & bisexuals	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Transgender people	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
White people (including Irish people)	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Asian or Asian British people	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Black or Black British people	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
People of mixed heritage	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Chinese people	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Travellers (gypsy/Roma/Irish heritage)	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
People from other ethnic groups	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Disabled People:						
Physical impairment, e.g. mobility issues which mean using a wheelchair or crutches.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Sensory impairment, e.g. blind/having a serious visual impairment, deaf/having a serious hearing impairment.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Mental health condition, e.g. depression or schizophrenia.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Learning disability/difficulty, e.g. Down's syndrome or dyslexia, or cognitive impairment such as autistic spectrum disorder.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Long-standing illness or health condition, e.g. cancer, HIV, diabetes, chronic heart disease or epilepsy.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Other health problems or impairments.	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Older People	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Children and Young People	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Faith Groups	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Pregnancy & Maternity	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		
Marriage & Civil Partnership	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>		

8. If you have indicated that there is a negative impact on any group, is that impact:

Legal? Yes No

Intended? Yes No

Level of impact High Low

No negative impact has been identified:

9. Could you minimise or remove any negative impact - how?

N/A

10. Could you improve a positive impact of the Function - how?

The programme would represent an element of the overall affordable homes programme, providing a positive impact. Further opportunities for positive impact will be considered as part of the overall affordable homes programme.

11. If there is no evidence that the Function promotes equality of opportunity or improved relations, could it be adapted so that it does - how?

N/A

12. Any other relevant notes:

N/A

SECTION 3 – CONSULTATION & RESEARCH IN RELATION TO THE EqIAA

13. What consultation has been conducted with groups and individuals from groups likely to be affected as well as staff, and what evidence has this provided about equalities impact?

The Draft Housing and Planning Bill published by Government in early October proposes significant changes to the delivery of affordable housing, and an ambitious target has been set to deliver one million new homes by 2021.

So far, however, the policy changes introduced in advance of the Bill have had an adverse effect on delivery and it seems highly likely that there will be a negative impact on the number of affordable homes built, particularly those for rent. The availability of capital grant to fund new homes has reduced significantly. This will make it less likely that the aims of the South Gloucestershire Housing Strategy can be delivered.

Welfare reform will have a material impact on housing associations, their customers and local authorities. The combined effect of welfare reform and the other policy changes is expected to be an increase in homelessness and in the use and cost of temporary accommodation.

Merlin's Business Plan assumes there will be no capital grant funding available for rented homes and minimal grant for shared ownership provision. It is therefore important to identify additional areas of income which will help to mitigate the impact of the funding cuts and ensure that Merlin can maximise delivery of new affordable homes in South Gloucestershire.

Merlin is undertaking a comprehensive review of its operations to identify opportunities for improved efficiency, cost savings and maximising income. A more proactive approach to effective asset disposals is a key part of this approach, and a revision to the Disposals Clawback Agreement would greatly facilitate this.

Merlin has identified 33 properties where the re-investment requirement over 30 years is nearly double the average cost per unit for their portfolio overall. Disposal of these properties has the potential to achieve a number of benefits:

- i. Revenue loss ceases;
- ii. Revenue spend in managing and maintaining these properties can be redirected to other properties and services;
- iii. Capital spend on improvement works can be redirected to other properties;
- iv. Net capital receipt from disposal is released for reinvestment in new homes to meet SGC affordable homes targets and Merlin Corporate Plan objectives - anticipated to range between £50,000 and £100,000 per unit sold;
- v. Improved levels of customer satisfaction;
- vi. Reduction in the number of customers living in fuel poverty;
- vii. Investment in disposed properties by whoever buys them.

Overall, it is anticipated that there will be a positive impact for all in relation to this proposal as indicated in Section 2 of this EqIAA.

14. What relevant research (data, reports, expert opinion etc.) has been conducted and what evidence has this provided about equalities impact?

NB. HomeChoice is currently upgrading the re-housing system and is in the process of transferring applicants from the old system to the new. As a result, the below information,

collated in June 2014, provides an indication of HomeChoice data.

Total Population

The population estimate for South Gloucestershire (taken from the 2011 national census) was 262,800.

HomeChoice

The number on HomeChoice on 01.01.14 was 6,528.

Ethnicity

The table below compares the ethnic background of the population of South Gloucestershire in the 2011 census with applicants on HomeChoice on 01.01.14:

Group	District		HomeChoice	
	Number	% of Population	Number	% of HomeChoice Population
Asian/Asian British – Bangladeshi	238	0.1%	#	0.1%
Asian/Asian British – Indian	2,699	1%	10	0.2%
Asian/Asian British – Pakistani	698	0.3%	18	0.3%
Asian/Asian British – Chinese	1,312	0.5%	#	0.1%
Asian/Asian British – Other	1,493	0.6%	41	0.6%
Black/African/Caribbean/Black British – African	987	0.4%	86	1.3%
Black/African/Caribbean/Black British – Caribbean	980	0.4%	78	1.2%
Black/African/Caribbean/Black British – Other	251	0.1%	27	0.4%
Mixed/Multiple Ethnic Groups – White & Asian	1,016	0.4%	20	0.3%
Mixed/Multiple Ethnic Groups – White & Black African	396	0.2%	15	0.2%
Mixed/Multiple Ethnic Groups – White & Black Caribbean	1,516	0.6%	100	1.5%
Mixed/Multiple Ethnic Groups – Other	739	0.3%	13	0.2%
White – English/Welsh/Scottish/Northern Irish/British	241,611	91.9%	4995	76.5%
White – Irish	1,223	0.5%	30	0.5%
White - Gypsy or Irish Traveller	271	0.1%	28	0.4%
White – Other	6,469	2.5%	204	3.1%
Other Ethnic Group - Arab	366	0.1%	0	0%
Any Other ethnic group	502	0.2%	31	0.5%
Declined to answer	---	---	822	12.6%

Religion or Belief

This table compares the religion/belief of residents responding to the 2011 census with applicants on HomeChoice on 01.01.14:

Religion/Belief	District		HomeChoice	
	Number	% of Population	Number	% of HC Population
Christian	156,504	59.6%	1974	30.2%
Buddhist	708	0.3%	16	0.3%
Hindu	1,681	0.6%	#	0.1%
Jewish	145	0.1%	0	0%
Muslim	2,176	0.8%	69	1%
Sikh	623	0.2%	#	0.1%
Other religion	888	0.3%	86	1.3%
No religion	80,607	30.7%	2165	33.2%
Religion not stated	19,435	7.4%	2207	33.8%

Age

This table compares the age of residents responding to the 2011 census with applicants on HomeChoice on 01.01.14:

Age Range (Years)	South Gloucestershire	Age Range (Years)	HomeChoice
Age 0 to 4	6.1%	16-24	15.9%
Age 5 to 9	5.6%		
Age 10 to 14	6.1%	25-34	30.9%
Age 15 to 19	6.7%		
Age 20 to 24	5.9%	35-44	19.9%
Age 25 to 29	5.9%		
Age 30 to 34	6.1%	45-54	13.8%
Age 35 to 39	6.6%		
Age 40 to 44	7.9%	55-64	8.3%
Age 45 to 49	8.1%		
Age 50 to 54	6.6%	65+	11.2%
Age 55 to 59	5.7%		
Age 60 to 64	6.0%		
Age 65 to 69	5.1%		
Age 70 to 74	4.0%		
Age 75 to 79	3.3%		
Age 80 to 84	2.3%		
Age 85 and over	2.1%		

Sexual Orientation and Gender Identity in South Gloucestershire

There is no hard data on the number of lesbians, gay men, bisexuals and transgendered people in the UK. However, the Government is using the figure of 5-7% of the population and Stonewall¹ agree that this is a reasonable estimate. 2% of applicants fall within this category on HomeChoice. Whilst this is clearly lower than the Government estimate, it should be noted that 30% of applicants on HomeChoice chose not to answer this question.

Overall, it is anticipated that there will be a positive impact for all in relation to this proposal as indicated in Section 2 of this EqIAA, however it is particularly worthwhile noting that those groups where a higher proportion of residents are part of HomeChoice than is the proportion in the South Gloucestershire population, have the potential for positive impact to be realised:-

- Black/African/Caribbean/Black British – African
- Black/African/Caribbean/Black British – Caribbean
- Black/African/Caribbean/Black British – Other
- Mixed/Multiple Ethnic Groups – White & Black Caribbean
- White - Gypsy or Irish Traveller
- Any Other ethnic group
- Those aged 16 – 34 years

15. What contributions does your function/activity make towards promoting community cohesion?

Affordable homes for rent contribute towards establishing mixed, balanced and sustainable communities and therefore have a positive impact on community cohesion.

¹ For further information, visit: <http://www.stonewall.org.uk/>

SECTION 4 – OUTCOMES

16. Outcome

Outcome	Your response	Reason(s) and Justification
Outcome 1: No major change required.	<input checked="" type="checkbox"/>	Additional affordable housing will become available in South Gloucestershire, thus meeting a clear need. The principles and advantages of this are laid out in the table below.
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input type="checkbox"/>	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

	Principle	Advantages	Other comments
1	to enable Merlin to make best use of assets	Will deliver additional affordable housing, reduce the number of Merlin customers in fuel poverty and allows potential for improvement to stock by purchasers	Demonstrates good partnership working
2	to enable additional affordable housing in South Gloucestershire for social, affordable or intermediate rent (or any future sub-market rent tenure type as agreed with the Council)	Additional affordable housing for rent delivered, which will contribute towards meeting the Council's homelessness statutory duty	HCA funding is to be directed towards low cost home ownership and this is an opportunity to develop homes for rent
3	to ensure that any relevant net capital receipts are ringfenced for spend within South Glos	New affordable homes will be delivered in the District	The Transfer Agreement does not restrict where Merlin can spend its share of the capital receipts so this will introduce an appropriate restriction
4	that the subsidy does not replace any other subsidy (i.e. any opportunity for Homes and Communities Agency (or other) funding is exhausted first)	The new affordable homes delivered will be genuinely additional	Merlin will provide SGC with data on the schemes where the subsidy is used identifying clearly why the subsidy was required.
5	Any proposal to use the funding to refurbish or upgrade existing units is subject to specific Council approval	The Council will have the opportunity to direct funding towards specific priorities (e.g. homeless hostel)	In principle Merlin will not be able to use the funding for stock reinvestment
6	That any projects are value for money (i.e. an equivalent cost per unit as HCA-funded projects)	The quantum of affordable housing that can be delivered from the funding is maximised.	Merlin proposes to use the receipt as subsidy for affordable rented homes and would use reasonable endeavours to lever in additional private finance on the back of such

			receipt.
7	That the funding is committed within a reasonable timescale	It will benefit SGC for the additional affordable housing to be available for SGC nominees as quickly as possible	The number of properties to be disposed of annually is not expected to materially exceed 10. If a higher number is identified for disposal in future years, Merlin would provide further details to SGC to ensure the approach is managed and supports SGC's wider strategic objectives.
8	That the Council receives 100% nominations on first letting and 75% thereafter	The additional affordable housing will be available for SGC nominees as opposed to Merlin internal transfers	
9	That funding for aids and adaptations to Merlin properties of up to £4,000 per unit to March 2021 (to a maximum budget of £200,000 per year) is tied into the agreement.	This will bring an additional £1,000,000 of value into the proposal and will preserve the current arrangement which expires on 31 st March 2016.	The Council has a statutory duty to provide aids and adaptations. If this funding were not available from Merlin, the Council would have to cover the costs of adaptations costing over £1,000.

17. Actions to be taken as a result of this EqIAA.

HomeChoice conduct monitoring on an on-going basis, which will allow us to identify and address any equalities issues that may emerge. This will include monitoring of:

- Number of applications received.
- Number of applications registered within 10 working days.
- Number of applicants not accepted onto the Housing Register.
- Number of properties advertised by type, area and landlord.
- Number of bids and method of bidding.
- Number of bids for each property by band.
- Profile of bids, i.e. by age of applicant, ethnicity, transfer, homelessness.
- Number of accepted offers by band.
- Number of offers refused.
- Number of properties advertised more than once (hard to let).
- Number of review requests.
- Number of complaints.

The Council will monitor compliance via an annual disclosure statement which will be taken to the Adults, Housing and Public Health Committee.

SECTION 5 – EqIAA EVIDENCE

18. List and attach the evidence you have which shows how you have systematically considered equality impact.

- HomeChoice monitoring data (01/01/2014)
- Draft Housing and Planning Bill
- Merlin meeting outcomes